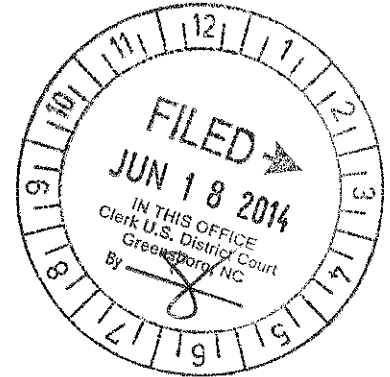


UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA



MAUREEN GREGORY

Plaintiff

-v-

Civil Action No. 14CV502

ULTIMATE VACATION GROUP LLC

ALTERNATE BUSINESS NAME

(ROYAL BAHAMAS CRUISE LINE)

Defendant

\_\_\_\_\_ /

**COMPLAINT**

Plaintiff, Maureen Gregory (hereafter "Plaintiff"), individually, hereby sues Defendant, Ultimate Vacation Group LLC (Royal Bahamas Cruise line). (hereafter "Defendant") for violations of the Telephone Consumer Protection Act 47 USC § 227 (hereafter "47 USC § 227"), and the North Carolina Consumer Protection NC General Stat Chapter §75-102 (a)

**PRELIMINARY STATEMENT**

VERIFIED COMPLAINT

-1-

1. This is an action for damages brought by Plaintiff against Defendant for violations of 47 USC §227(b)(1)(A) ,47 USC §227(b)(1)(A)(B) and the North Carolina Consumer Protection NC General Stat Chapter §75-102 (a)
2. Upon belief and information, Plaintiff contends that many of these practices are widespread and common actions of the Defendant. Plaintiff intends to propose discovery to Defendant identifying these other individuals who have suffered similar violations.
3. Plaintiff contends that the Defendant has violated such laws by repeatedly harassing Plaintiff in attempts to Solicit a cruise to the Bahamas.

#### **JURISDICTION AND VENUE**

4. Jurisdiction of this Court arises under 47 U.S.C. §227(g)(2), 47 U.S.C. § 227(b)(3) and 47 U.S.C. § 227(c)(5).
5. Venue is proper pursuant to 28 U.S.C. §1391(b). NC Stat § 75-105 (f) Venue in this District is proper in that the Plaintiff domiciles here, the Defendant transacts business here, and the conduct complained of occurred here.

#### **VERIFIED COMPLAINT**

### **PARTIES**

6. Plaintiff, Maureen Gregory is a natural person residing at, 2515 Pendergrass Rd Raeford  
Hoke County North Carolina .

7. Defendant, ULTIMATE VACATION GROUP LLC ALTERNATE BUSINESS  
NAME (ROYAL BAHAMAS CRUISE LINE)

5224 W STATE RD 46 #139 SANFORD, FL 32771

8. Upon information and belief Defendant, Ultimate Vacation Group LLC, (Royal  
Bahamas Cruise Line), is a foreign corporation, unauthorized to do business in  
North Carolina.

### **FACTUAL ALLEGATIONS**

9. Plaintiff has no prior or present established relationship with the Defendant

10. Plaintiff has never given any Defendant express permission to call Plaintiff's  
Residential phone. (See Attached Exhibit A)

11. From April 7, thru April 12, 2014, Defendant violated 47 USC § 227 by calling  
Plaintiff's Residential phone no less than 5 times with no prior express  
permission given by Plaintiff. (See Attached Exhibit A)

12. From April 7, 2014 thru April 12, 2014, Defendant violated 47 USC § 227 by calling  
Plaintiff's Residential phone no less than 5 times using an automatic telephone  
dialing system.

VERIFIED COMPLAINT

13. From April 7, 2014 thru April 12, 2014, Defendant violated North Carolina Stat §75-102 (a) making a telephone solicitation to a telephone subscriber's telephone number the telephone subscriber's telephone which appears in the latest edition of the "Do Not Call" Registry..

**COUNT I VIOLATION**  
**OF THE TELEPHONE CONSUMER PROTECTION ACT**

**47 U.S.C. §227**

14. Plaintiff alleges and incorporates the information in paragraphs 1 through 13.

15. Defendant has demonstrated willful or knowing non-compliance with 47 U.S.C.

§227(a)(4) by calling the Plaintiff's number, for the purpose of encouraging the purchase or rental of, or investment in, property, goods, or services, which is transmitted to any person. The Plaintiff has never given Defendant permission to call Plaintiffs Residential phone. Plaintiff is entitled to damages of \$1500 per violation pursuant to 47 U.S.C. §227 (b)(1)(B).

16. Defendant has demonstrated willful or knowing non-compliance with 47 U.S.C.

§227(b)(1)(A) by using an automatic telephone dialing system to call the Plaintiff's number, which is assigned to a Residential telephone service. Plaintiff is entitled to damages of \$1500 per violation pursuant to 47 U.S.C. §227(b)(3).

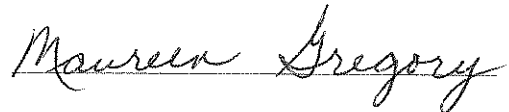
VERIFIED COMPLAINT

**WHEREFORE**, Plaintiff demands judgment for money damages against Defendant \$18,500 together with such other and further relief as the Court may deem reasonable and just under the circumstances of NC Stat §75-105 (2)

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Respectfully submitted this 15 of June, 2014



Maureen Gregory

2515 Pendergrass Rd

Raeford, North Carolina 28376

910-848-2607

VERIFIED COMPLAINT

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA

MAUREEN GREGORY  
PLAINTIFF

-v-

ULTIMATE VACATION GROUP LLC  
(ALTERNATE BUSINESS NAME)  
ROYAL BAHAMAS CRUISE LINE  
DEFENDANT

Civil Action No. \_\_\_\_\_

VERIFICATION OF COMPLAINT

STATE OF NORTH CAROLINA  
County of Hoke

BEFORE ME personally appeared MAUREEN GREGORY PLAINTIFF who, being by me first duly sworn and identified in accordance with North Carolina Law, deposes and say:

1. My name is Maureen Gregory, Plaintiff herein.
2. I have read and understood the attached foregoing complaint filed herein, and each fact alleged therein is true and correct of my own personal knowledge

FURTHER THE AFFIANT SAYETH NAUGHT.

  
MAUREEN GREGORY, AFFIANT

SWORN TO, and subscribed before me this 15<sup>th</sup> day of June 2014

  
NOTARY PUBLIC

MY COMMISSION EXPIRES: 11-03-14

